

Return Date: _____

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re: _____X

Emmanuel Loncke,

Case No. **20-42261-nhl**
Chapter _____

Debtor(s)
-----X

_____,
Plaintiff(s),

Adv. Proc. No. **20-1105-nhl**

-against-

Kabbadge,

Defendant(s).
-----X

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed application of

Adversary Proceeding, a hearing will be held before the Hon.

Lord, Bankruptcy Judge, to consider the motion for an Order
granting relief as follows:

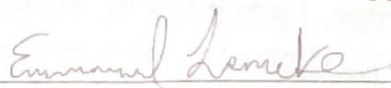
Requesting that the court enters a default judgement against the defendant

Date and time of hearing: February 18, 2021. 10:30am

Location: U.S. Bankruptcy Court

Telecommunications hearing
call in and use the code
1(888) 363-4734
Code 4702754

Dated: 01/27/21



Signature

Print name: Emmanuel Loncke

Address: 350 beach 75th st
Arverne NY 11692

Phone: 404-993-3479

Email: Excel_emt@yahoo.com

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re: _____X

Emmanuel Loncke,

Case No. 20-42261-nhl
Chapter 7

Debtor(s)
_____-X

_____,
Plaintiff(s),

Adv. Proc. No. 20-1105-nhl

-against-

Kabbadge,

Defendant(s).
_____-X

APPLICATION IN SUPPORT OF MOTION

TO THE HON. Lord, Bankruptcy Judge

I, Emmanuel Loncke, Plaintiff, make this application in support of my motion for the following relief:

\$25,000 from Kabbadge in punitive damages and \$25,000 for compensatory damages for collect debts from the debtor account causing mental and financial stress while disregarding the bankruptcy law

In support of this motion, I hereby allege as follows:

I made multiple attempts to contact Kabbadge to inform them that I was going through bankruptcy and also to stop taking payments while in process June 2020. There was multiple deductions made even after contact was made June 4th, 18th and 29th from a Wells Fargo Account total \$623.55. No money was return even after contacting the call center. I am seeking relief because this situation cause emotional distress because I was not employed at the time and it was trying to make sure that my family's basic needs were met.

Wherefore, movant prays for an Order granting the relief requested.

Dated: 01/27/21

Emmanuel Loncke
Signature

To whom it may concern,

I Emmanuel Loncke is seeking punitive damages because there willful disregard for the federal bankruptcy law and compensatory damages for the money they took from me during the pandemic. I am requesting \$50,000 from Kabbadge and \$50,000 from PayPal to cover both damages totaling \$100,000. This was extremely stressful for me and my family not knowing how we were going to survive without any form of income coming in our household. I suffered financially because I was not able to take care of my family basic needs such as food and rent during the pandemic which stressed my mental capacity to perform everyday duties needed for my children to learn in an at home environment.

This can with constant headaches ,high blood pressure and weight loss during the bankruptcy. I have tried various ways to reach out to Kabbadge and PayPal through various forms of email/phone calls. No response was given and the funds that were taken from my accounts was never returned. I could not understand why even with me sending letters or adversary to them on multiple accounts that they wouldn't acknowledge the fact that they were in fault to return the money that they took but still no response. I will continue to seek counseling to try to get over the mental anguish that this situation has caused but I really don't know if I will ever be able to recover.